

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
E911 Requirements for IP-Enabled Service Providers	)	WC Docket No. 05-196
	)	
	)	
	)	

**COMMENTS OF AT&T CORP.**

Leonard J. Cali  
Lawrence J. Lafaro  
Judy Sello  
Mart Vaarsi

AT&T Corp.  
Room 3A229  
One AT&T Way  
Bedminster, NJ 07921  
(908) 532-1846  
(908) 532-1281 (facsimile)

*Attorneys for AT&T Corp.*

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AT&T Corp. (“AT&T”) respectfully submits these comments on the Commission’s Notice of Proposed Rulemaking regarding E911 requirements for IP-enabled service providers.<sup>1</sup>

**SUMMARY**

Concurrently with the release of this *NPRM*, the Commission adopted its *IP-Enabled Services Order*, imposing extensive and complex new requirements for providers of interconnected Voice over Internet Protocol (“VoIP”) services to extend enhanced 911 (“E911”) capabilities to their customers, no later than November 28, 2005. *Id.* ¶¶ 36-37.<sup>2</sup> This *NPRM* proposes to modify and further extend some of these

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<sup>1</sup> First Report and Order and Notice of Proposed Rulemaking, FCC 05-116, *In the Matters of IP-Enabled Services*, WC Docket No. 04-36 (“*Order*”), and *E911 Requirements For IP-Enabled Service Providers*, WC Docket No. 05-196 (“*NPRM*” or “*Notice*”), released June 3, 2005, published in 70 Fed. Reg. 37,273 and 37,307 (June 29, 2005).

<sup>2</sup> Interconnected VoIP service is defined for purposes of the *Order* as bearing the following characteristics: “(1) the service enables real-time, two way voice communications; (2) the service requires a broadband connection from the user’s location; (3) the service requires IP-compatible CPE; and (4) the service offering permits users generally to receive calls that originate on the PSTN and to terminate calls to the PSTN.” *Order* ¶ 24.

requirements, by requiring, among other things, automatic location identification (“ALI”) for transient users of interconnected VoIP services, possibly by as early as June 1, 2006. AT&T recognizes the need to update the E911 system to keep pace with technological changes and fully supports the Commission’s efforts in this regard. AT&T is concerned, however, that adoption of still additional E911 requirements at this time may impede the implementation of the requirements already imposed by the *Order*, which AT&T and the rest of the industry are now diligently working to implement. Also, AT&T believes that valuable lessons may be learned from implementation of these recently adopted E911 requirements that will facilitate their extension, as proposed in the *NPRM*. Accordingly, AT&T urges the Commission to not adopt any new regulations at this time, but rather to allow carriers to focus their energies and resources on meeting the November 28, 2005, date and to gain some experience in operating under the new requirements before modifying them or extending them. Nor is extension of these E911 requirements to IP-based services other than fully interconnected VoIP necessary or warranted.

AT&T fully supports the Commission’s initiative with respect to availability of E911 capability for persons with disabilities who use interconnected VoIP services and urges the Commission to oversee a task force with members of the industry and the disability community to ensure their access needs are met. AT&T fully recognizes the need to safeguard the privacy of customer location information but believes that existing regulations, marketplace forces and contractual arrangements between IP providers and their customers are sufficient to achieve this objective.

## BACKGROUND

In its *IP-Enabled Services Order*, the Commission took substantial steps to extend the coverage of E911 capability. The new rules it adopted require, among other things, that an interconnected VoIP provider must transmit all 911 calls, as well as a call back number and the caller's "Registered Location" for each call, to the public safety answering point ("PSAP"), designated statewide default answering point, or appropriate local emergency authority that serves the caller's Registered Location. These calls must be routed via the dedicated Wireline E911 network, carry ANI and, if necessary, pseudo-ANI, and the Registered Location must be available from or through the ALI database. *Id.* ¶¶ 37, 42.<sup>3</sup>

The *Order* also requires providers of interconnected VoIP services to obtain location information from their customers. Specifically, prior to the initiation of service, interconnected VoIP providers must obtain from each customer, prior to the initiation of service, the physical location at which the service will first be utilized. Providers of interconnected VoIP services that can be utilized from more than one physical location must provide their end users one or more methods of updating information regarding the user's physical location. Any method utilized must allow an end user to update his or her Registered Location at will and in a timely manner, including at least one option that requires use only of the CPE necessary to access the interconnected VoIP service. *Id.* ¶ 46.

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<sup>3</sup> An interconnected VoIP provider need only provide such call back and location information as the PSAP, designated statewide default answering point, or appropriate local emergency authority is capable of receiving and utilizing. *Id.* ¶ 42.

The *Order* (§§ 48-49) also requires interconnected VoIP service providers to comply with detailed customer notification requirements, specifying when E911 service may not be available; to obtain from customers affirmative acknowledgement of such notification by customers; and to distribute various warning materials.<sup>4</sup> Finally, the *Order* (§ 50) requires service providers to file detailed verification of their compliance with these requirements with the Commission.

The *NPRM* (§ 57) seeks comment on whether the Commission should require steps to reliably and automatically provide location information to public safety answering points (“PSAPs”) for portable interconnected VoIP services. As the *NPRM* notes, “one of the central customer benefits of portable interconnected VoIP services is a lack of geographic restrictions.” *Id.* Interconnected VoIP users may use their service on a “nomadic” basis, connecting to the PSTN from fixed locations other than their Registered Location, wherever a broadband connection is available; or on a wireless “mobile” basis, moving between addresses during a call. The lack of a geographically fixed location for either type of call presents obvious difficulties in reliably and automatically determining the location of the customer, *i.e.*, providing ALI for E911 purposes.

The *NPRM* poses a number of questions directed to this issue. Among them are: what particular method should be used to automatically track the location of a VoIP user and whether this capability should be required as soon as June 1, 2006 (§ 57); whether the Commission should extend its rules to require E911 capability for services other than

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<sup>4</sup> By Public Notice DA 05-2085, released July 26, 2005, the Commission’s Enforcement Bureau announced that it would not seek to enforce the affirmative acknowledgement requirement for a 30-day period past the July 29, 2005, effective date, subject to carriers filing specified reports by August 10.

fully interconnected VoIP services, specifically to one-way services (*i.e.*, either inbound-only or outbound-only) and IP-based services that do not require a broadband connection (§ 58); whether performance standards should be adopted (and a host of subsidiary provisioning and application issues) (§ 59); whether additional reporting or customer notification requirements are needed (§ 60); whether additional customer privacy protections are needed (§ 62), and how concerns for persons with disabilities should be addressed.

**I. THE COMMISSION SHOULD NOT ADOPT ANY ADDITIONAL REQUIREMENTS UNTIL THE INDUSTRY GAINS EXPERIENCE IN IMPLEMENTING AND OPERATING UNDER THE RULES THAT BECOME EFFECTIVE ON NOVEMBER 28, 2005.**

AT&T recognizes the need to extend E911 capability to a range of different IP-enabled applications to meet significant public safety concerns and it fully supports the Commission's efforts in this regard. Indeed, the benefits of IP-based E911 are likely to be substantial, and are expected to extend well beyond traditional wireline E911 capabilities. It is anticipated that individuals will be able to reach 911 emergency services from whatever peripheral device they are using -- including Blackberries and text messaging devices. It is also expected that IP technology will improve 911 accessibility for hearing-impaired and speech-impaired users. Furthermore, the integration of voice and data applications through VoIP promises to provide first responders with important real time data regarding the individual who placed a 911 call, or even details regarding the physical location from which such a call originated (*e.g.*, floor plans). Indeed, AT&T is exploring the possibility of these types of solutions.

However, two considerations militate against the imposition, at this time, of the new obligations described in the *NPRM*. First, the Commission has established an extremely ambitious date of November 28, 2005, for implementing the operational requirements of the *Order*.<sup>5</sup> Many of the same resources necessary to carry out these requirements are also essential to analyzing and evaluating the additional requirements proposed in the *NPRM*. To even fully assess the viability of the Commission's new proposals in this short time-frame is not realistic and could threaten the industry's ability to meet the currently mandated November 28, 2005 date.

For example, many of the same AT&T research, technical and operations staff who are currently engaged in an intense effort to meet the November 28 deadline, have the subject matter expertise necessary to evaluate the new requirements discussed in the *NPRM* and simply cannot be available for both projects. Also, there would be substantial additional expense entailed in attempting to pursue both efforts simultaneously even if appropriate expertise could be found. Still further, it is not clear whether all of the various options the *NPRM* has proposed -- access jack inventory, wireless access point inventory, access point mapping and triangulation, HDTV signal triangulation and various GPS-based solutions -- are in a sufficiently advanced state of development to allow general implementation by the proposed June 1, 2006 date. *See id.* ¶ 57.

Moreover, it would be highly advisable to allow the industry to gain some experience in operationalizing the existing E911 requirements before the Commission imposes new ones. Issues are likely to arise that are currently unforeseen and will be evident only after November 2005, when the industry implements the operational

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<sup>5</sup> *See* 70 Fed. Reg. 37,273.



requirements of the June 3 *Order*. It is likely that the experience thus gained by the industry will help the Commission to make better decisions on exactly how to extend the general interconnected VoIP 911 requirements to nomadic or mobile users. It is also likely to result in a smoother, less costly and more user-friendly extension of E911 capabilities to the subset of interconnected VoIP customers who use it on a transient basis.

The Commission's prior experience in implementing E911 requirements for Commercial Mobile Radio Service ("CMRS") providers is instructive in this regard. After adopting what the Commission itself acknowledged was an "aggressive" deployment schedule,<sup>6</sup> it found it necessary on two occasions to subsequently stay several of its requirements, and earlier this year, to grant yet additional waivers for requests to extend certain deadlines, including the year-end 2005 deadline requiring 95% penetration among subscribers of location capable handsets.<sup>7</sup>

The Commission and the courts have consistently recognized that actual experience is the best means for assessing the wisdom of a proposed course of action.<sup>8</sup>

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<sup>6</sup> *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, 17 FCC Rcd. 14,841, ¶ 5 (2002).

<sup>7</sup> *Id.* ¶ 2; *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, 18 FCC Rcd. 20,987, ¶¶ 1, 3 (2003); *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, 20 FCC Rcd. 7709, ¶ 2 (2005).

<sup>8</sup> *See, e.g., In the Matter of Application By Qwest Communications International, Inc.*, 17 FCC Rcd. 26,303, ¶ 430 (2002); *In the Matter of Implementation of the Telecommunications Act of 1996*, 17 FCC Rcd. 14,860, ¶ 145 (2002); *In the Matter of 2002 Biennial Regulatory Review*, 18 FCC Rcd. 4726, 4750 (2003). Or as the courts have frequently observed: "[A] month of experience will be worth a year of hearings." *Syracuse Peace Council v. FCC*, 867 F.2d 654, 660 (D.C. Cir. 1989), *citing American Airlines, Inc. v. CAB*, 359 F.2d 624, 633 (D.C. Cir.) (*en banc*), *cert. denied*, 385 U.S. 843

AT&T urges the Commission to use the opportunity presented by the imminent implementation of the requirements in its June 3 *Order* for the industry to gain additional experience in the operation of the E911 system in conjunction with interconnected VoIP services before extending those requirements to transient use of the service, with its even greater complexity. In order to assure a more orderly, efficient transition and to preserve the Commission's scarce resources that would be expended in overseeing an unduly "aggressive" transition schedule, the Commission should defer the adoption of any additional rules at this time.<sup>9</sup>

## **II. E911 REQUIREMENTS SHOULD NOT BE EXPANDED BEYOND FULLY INTERCONNECTED VOIP SERVICES.**

The *NPRM* (§ 58) seeks comment on whether the Commission should extend the E911 obligations it has imposed on providers of fully interconnected VoIP services to other VoIP services that are not fully interconnected. In particular, it asks whether these obligations should apply to the send-only, or receive-only (*i.e.*, one-way) VoIP services and tentatively concludes that they should.<sup>10</sup> Also, it asks whether the E911 requirements

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(1966).

<sup>9</sup> The *NPRM* (§ 59) also seeks comment on several ancillary issues, such as whether it should adopt performance standards for updating Registered Location information; the appropriate requirements for interconnected VoIP services in geographic areas where PSAPs are not connected to a Selective Router; treatment of wireless broadband connections; additional customer acknowledgement requirements; carrier reporting requirements, and other operational and administrative issues. Action on many of these items would also be premature because resolution of all of these issues would similarly benefit from the experience gained in implementing the November 2005 requirements.

<sup>10</sup> Specifically, the *NPRM* proposes that: "[A] provider of a VoIP service offering that permits users generally to receive calls that originate on the PSTN and separately makes available a different offering that permits users generally to terminate calls to the PSTN should be subject to the rules we adopt in today's *Order* if a user can combine those

should apply to other services, such as IP-based voice services that do not require a broadband connection.

AT&T believes that these proposals are ill-conceived and should be rejected. With respect to one-way calling, such applications (for example, inbound 8YY calling or outbound telemarketing calling) differ significantly from the “regular telephone” service with two-way capability that customers have become accustomed to associating with E911 service. Hence, there is no reasonable customer expectation that E911 capability will be available with such applications. This is a factor the *Order* (§ 23) deemed significant in determining whether to impose E911 obligations on a particular service. Moreover, VoIP providers have no reliable way of knowing the precise use that a customer may make of a particular service. Even if a customer purchases a service with inbound capability and a separate service with outbound capability from the same vendor, it is the customer, not the vendor who controls use of the service. The vendor would not necessarily know if and when the customer chose to combine these services in a particular application and if and when it chose to use them separately. The burden to provide E911 capability cannot reasonably be based on the VoIP provider when it does not have the information necessary to determine whether such capability is required. Indeed, the requirement becomes even more untenable in a multi-vendor environment -- which is now the rule, not the exception among business customers -- where no carrier necessarily knows a customer’s entire service inventory or its intended applications for the services they purchase.

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separate offerings or can use them simultaneously or in immediate succession.”

The most rational approach is not to distinguish between inbound and outbound services, but rather to assign responsibility for E911 compliance to the carrier who provides a customer's local service at a particular location. It is that carrier who assigns the telephone number for a particular location and has the requisite customer, local service and E911 infrastructure information to assure the proper provision of the service. It would make no sense to place E911 obligations on a carrier who provided, for example, a stand-alone outbound (much less inbound) long distance calling service to a customer that obtained local service from another carrier. The E911 obligation naturally follows from the provision of the local service, not outbound or inbound long distance services. Neither is a replacement for a customer's local service. In both instances the customer must obtain local service separately and the imposition of E911 responsibility on any other party would be redundant and confusing.

Extending E911 requirements to services that do not require a broadband connection (*e.g.*, dial-up VoIP) is ill-advised for essentially this same reason. Such services invariably ride over local service that is E911 compliant and imposition of a separate narrowband obligation is unnecessary.

**III. TO IMPLEMENT DISABILITY MEASURES IN ACCORDANCE WITH SECTION 255 OF THE ACT, THE COMMISSION SHOULD APPOINT A TASK FORCE THAT INCLUDES REPRESENTATIVES OF THE DISABILITY COMMUNITY AND AFFECTED SEGMENTS OF THE INDUSTRY.**

The Commission asks whether persons with disabilities currently can use interconnected (and other) VoIP services to directly call a PSAP via a TTY, and seeks comment on whether "there are any steps that the Commission needs to take to ensure that people with disabilities who desire to use interconnected VoIP service obtain access

to E911 services.”<sup>11</sup> This objective comports with the mandate of Section 255 of the Communications Act (47 U.S.C. § 255) that manufacturers of telecommunications and customer premises equipment (“CPE”), and telecommunications carriers, ensure that their offerings are accessible to and usable by persons with disabilities “if readily achievable.”<sup>12</sup>

Currently, in many cases hearing and speech-impaired customers who use TTYs to call E911 PSAPs cannot reliably use interconnected VoIP services to place text relay calls that originate or terminate over the PSTN. This is primarily due to VoIP packet loss compensation methods that result in an unsatisfactory level of transmission for carriers to properly connect emergency calls, and for end users to provide emergency information.<sup>13</sup>

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<sup>11</sup> *NPRM* ¶ 63. The *NPRM* also asks for comment on the basis of the Commission’s authority to impose any obligations that commenters propose. While Section 255, by its terms, imposes requirements only on manufacturers and providers of telecommunications services (not information service providers), the Commission has recognized that it has authority to impose the same accessibility requirements on information services under its ancillary Title I jurisdiction. See *Implementation of Sections 255 and 251 (a)(2) of the Communications Act of 1934, as Enacted by the Telecommunications Act of 1996*, 16 FCC Rcd. 6417, ¶ 93 (1999) (“*Disability Access Order*”). The Commission’s assertion of ancillary jurisdiction over information services is well-settled, having been upheld by the Court of Appeals over twenty years ago. *Computer and Communications Indus. Ass’n. v. FCC*, 693 F.2d 198, 213 (D.C. Cir. 1982). Hence the Commission has ample authority to impose appropriate requirements to implement Section 255.

<sup>12</sup> If such access is not “readily achievable,” the equipment or service must be made “compatible” with peripherals or specialized CPE commonly used to allow access by persons with disabilities, if such compatibility is “readily achievable.” See 47 U.S.C. § 255(d). The term “readily achievable” means “easily accomplished and able to be carried out without much difficulty and expenses.” 47 C.F.R. §§ 6.3(g), 7.3(h). Moreover, application of the Section 255 criteria requires a case-by-case analysis of the offering in question. See generally *Disability Access Order* ¶¶ 43-70.

<sup>13</sup> For example, in a TTY call originated call over the PSTN using Baudot or Turbocode® protocols, loss of a single packet in the PSTN-to-VoIP translation could render the dialed number and / or the caller’s typed message unintelligible. Similar, but less serious, distortion may also occur with the 300/1200/2400 bps ASCII protocol when

In some preliminary, geographically limited testing, AT&T has found VoIP-to-VoIP and PSTN-to-PSTN transmission accuracy to be satisfactory. However, VoIP-to-VoIP calls are still infrequent, and high volumes of VoIP-to-PSTN calling will continue for the foreseeable future. Hence, there is a critical need to resolve this technical issue.

Additionally, with present technology carriers are unable to assure that all E911 calls by unregistered callers using TTYs over VoIP will be routed automatically to the same PSAP as other E911 callers. This operational obstacle has already been recognized by the Commission in the context of relay calls. Caller ID information is not transmitted to relay centers on calls completed using VoIP, and communications assistants (“CAs”) at those centers must obtain emergency callers’ geographic locations from those end users. Moreover, relay centers lack access to the databases used to route other E911 traffic, and therefore must rely on alternate databases to locate a PSAP in the caller’s area. For these reasons, the Commission has waived until January, 2008 the requirement that TRS centers route VoIP emergency calls to the PSAP nearest the caller, but rather has allowed centers to route such calls to the “appropriate PSAP” reflected in their internal databases.<sup>14</sup>

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the PSTN-to-VoIP translation is affected by packet loss. Most TTYs can communicate in ASCII, Baudot and Turbocode® protocols.

<sup>14</sup> See *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, 19 FCC Rcd. 12,475 (2004) (“2004 TRS Order”); *Provision of Improved Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, 18 FCC Rcd. 4761 (2003) (waiver for Internet Protocol (“IP”) relay calls). For Video Relay Service (“VRS”), the current waiver for emergency call handling extends to January 1, 2006. See *2004 TRS Order*, 19 FCC Rcd. at 12,522, ¶¶ 117-118 (2004).

These technical and operational impediments to processing the large majority of TTY calls to PSAPs over VoIP preclude making such E911 calls “readily achievable” at this time, and require resolution on an industry-wide basis.<sup>15</sup> Any proposed solution that is not sound from the start and adequately field tested (a process that is unavoidably time consuming) could be a serious and clearly unacceptable setback for both users and the industry. Accordingly, AT&T submits that the Commission should appoint a task force to investigate and address solutions to these issues. In addition to personnel from an organization with appropriate technical expertise, the task force should include representatives from the disability community and from affected segments of the industry to bring varied perspectives to the evaluation of these issues. The Commission should direct the task force to publicly report its findings by the June 1, 2006 date referenced in the *NPRM* (§ 57), and thereafter at periodic intervals determined by the Commission in light of the initial report’s findings. This process is best calculated to allow a resolution of these matters in a manner that will best serve end users, carriers, and the public interest.<sup>16</sup>

Pending these solutions, however, TTY users can successfully use their equipment in conjunction with PSTN/wireline service to directly access PSAPs for emergency calling, or on a VoIP-to-VoIP basis where available, rather than through relay

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<sup>15</sup> The current TRS waiver for processing emergency calls placed over VoIP is subject to periodic progress reporting by carriers concerning the ability to process such traffic. *See 2004 TRS Order*, 19 FCC Rcd. at 12526, ¶ 140. AT&T notes that to date no entity that has filed such reports has indicated that there is any near term solution to these problems.

<sup>16</sup> The task force described above can also address appropriate resolution of technical and other obstacles to making E911 service using VoIP accessible to persons with other forms of disabilities in addition to hearing and speech impairments.

centers. For the reasons described above, this procedure is a more reliable and faster means for those users to obtain any emergency assistance that they may require. Moreover, to better assure that TTY users are aware of this capability, the Commission should explicitly require relay providers to include instructions on that procedure in outreach programs they are obligated by Commission order to conduct,<sup>17</sup> as well as in the mandatory notification on the introductory pages of their relay websites that the Commission has already required in its TRS proceedings.

#### **IV. THE COMMISSION SHOULD NOT ADOPT ANY ADDITIONAL CONSUMER PRIVACY REGULATIONS AT THIS TIME.**

The *NPRM* (¶ 62) notes that implementation of its new E911 rules will necessarily result in interconnected VoIP service providers maintaining a list of their customers' registered locations and asks whether it should adopt additional regulations to protect the privacy of such information. As the *Notice* recognizes (*id.* and *n.179*), the customer proprietary network information ("CPNI") provisions of Section 222 of the Act, 47 U.S.C. § 222, do not currently apply to interconnected VoIP service providers. AT&T urges the Commission to not extend these requirements beyond their current reach.

In determining whether to apply new regulations, the Commission must strike a balance between the need for additional consumer protection against the risk that overregulation may unduly burden service providers and stunt the growth of newly emerging services. Interconnected VoIP services are already subject to a broad array of federal and state consumer protection laws and there is no demonstrated need to add additional regulations for this particular type of information.

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<sup>17</sup> See *2004 TRS Order*, 19 FCC Rcd. at 12,512, ¶ 96.



Furthermore, there is intense and ever increasing competition in the marketplace for the provision of VoIP services. One public website lists 60 business and nearly 100 residential VoIP providers nationwide.<sup>18</sup> The ready availability of numerous alternative vendors, provides a strong incentive for IP service providers to fulfill customers' expectations that their privacy will be protected. Any service provider who did not do so would be at great risk of losing in the marketplace. As Commissioner Abernathy observed in the context of Internet services, "the robustly competitive market for ISP services gives providers ample incentive to engage in consumer-friendly practices and punishes providers that fail to do so."<sup>19</sup>

Still further, many VoIP service providers, including AT&T, have strong privacy policies that govern their relationships with their customers. These policies are well-publicized and readily available to consumers on public websites. AT&T's privacy policy is publicly accessible (*see* <http://www.att.com/privacy>), is provided at the time of subscription as one of the terms and conditions under which VoIP Service is provided, and commits the Company to protect "customer identifiable" information which an individual or other customer reasonably expects to be kept private." AT&T, consistent with industry best practices, does not share customer identifiable information without customer consent. The policy defines "customer identifiable information" as "information that, when associated with an individual identifies that individual, for example, a customer's name, address, telephone number, and e-mail address." While

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<sup>18</sup> <http://www.voip-info.org>

<sup>19</sup> Notice of Proposed Rulemaking, *Appropriate Framework for Broadband Access to the Internet over Wireless Facilities*, 17 FCC Rcd. 3019, 3070 (2002) (Separate statement of Commissioner Kathleen Q. Abernathy).

location information standing alone would not be “customer identifiable information,” records that would provide the history of a subscriber’s movements, when associated with a name or phone number, would be considered “customer identifiable information.” AT&T also has contractual provisions regarding privacy in its customer contracts for AT&T’s CallVantage Service, committing “always to respect [the customer’s] privacy” and providing a link to the AT&T Online Privacy Policy website for additional information.<sup>20</sup>

These kinds of existing incentives to protect customer’s privacy have proven to be -- and should continue to be -- fully adequate to protect the privacy of interconnected VoIP services customers. AT&T urges the Commission to not adopt additional regulations unless and until experience shows they are needed.

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<sup>20</sup> See AT&T CallVantage Service Subscriber Agreement, ¶ 4(a), available electronically at: <https://www.callvantage.att.com/cvterms>.

**CONCLUSION**

For the foregoing reasons, AT&T urges the Commission to not adopt, at this time, any of the new requirements proposed in the *NPRM*, but to actively pursue additional solutions for disabled users, and monitor industry experience in implementing the requirements already imposed by its *IP Enabled Services Order*, in order to allow the industry additional time to develop solutions to the issues presented in the *NPRM*.

Respectfully submitted,

AT&T Corp.

By: /s/ Judy Sello  
Leonard J. Cali  
Lawrence J. Lafaro  
Judy Sello  
Mart Vaarsi

AT&T Corp.  
Room 3A229  
One AT&T Way  
Bedminster, NJ 07921  
(908) 532-1846  
(908) 532-1281 (facsimile)

*Attorneys for AT&T Corp.*

August 15, 2005